

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERK'S OFFICE

UNITED STATES OF AMERICA

V.

MICHAEL CROOKER

)
)
)
)
)
)
)

2006 MAR 22 A 11:03

CR-04-30034-MAP U.S. DISTRICT COURT
DISTRICT OF MASS.

DEFENDANT'S MOTION TO APPOINT A SECOND ATTORNEY

Defendant requests that the court appoint a second attorney in this case to assist Attorney Bongiorno. The government has three attorneys who have filed appearances in this case; the defendant only one.

Attorney Bongiorno is an overworked, high-profile, private defense attorney who took on this charity case thinking that it was a simple one-count silencer case, when in reality it is much more complicated and the silencer charge is just a ruse, probably never to be prosecuted at all. See Defendant's Motion to Dismiss Due to Scientific Impossibility of Conviction and Defendant's Motion to Dismiss Due to Deprivation of Speedy Trial and Prosecutorial Misconduct Related Thereto.


This case is no closer to trial than it was a year ago at this time. Defendant has not seen or spoken to Attorney Bongiorno since last year, though there has been some minimal correspondence.

This court has previously appointed the defendant Crooker two attorneys in a civil case. The same needs to happen here. Attorney Bongiorno cannot handle all the work here, plus all his

-2-

other obligations and trials. Much needs to be done, and done expeditiously, or the defendant could be held for many years without bail, on top of the 21-months of detention that has already occurred.

Respectfully submitted,


Michael Alan Crooker, pro se
CCI-MacDougall
1153 East Street South
Suffield, CT 06080

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have this date mailed copies of the foregoing to the following persons: Kevin O'Regan, AUSA, U.S. Attorneys, 1550 Main Street, Springfield, MA 01103 and Vincent Bongiorno, Attorney, 95 State Street, Suite 309, Springfield, MA 01103.

Dated: March 21, 2006

s/ 